

EXHIBIT 2

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: Anadarko Petroleum Corporation
Securities Litigation

Case No. 4:20-cv-576

District Judge Charles R. Eskridge III

CLASS ACTION

**DEFENDANTS' FIRST SUPPLEMENTAL RESPONSES AND OBJECTIONS TO
LEAD PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure (“Federal Rules”) 26 and 33 and Rule 33.1 of the Local Civil Rules of the United States District Court for the Southern District of Texas (“Local Rules”), Defendants Anadarko Petroleum Corporation (“Anadarko”), R.A. Walker, Robert G. Gwin, Robert P. Daniels and Ernest A. Leyendecker, III (collectively, “Defendants”) hereby submit the following supplemental responses (“First Supplemental Responses”) and objections (“First Supplemental Objections”) to Lead Plaintiffs Norfolk County Council as Administering Authority of the Norfolk Pension Fund, Iron Workers Local #580 Joint Funds, and Building Trades United Pension Trust Fund’s (collectively, “Lead Plaintiff”) First Set of Interrogatories to Defendants (“Interrogatories”) in the above-captioned litigation (“Action”).

Defendants provide these First Supplemental Responses and Objections without waiver of or prejudice to (i) their right at a later time to raise objections as to the relevance, materiality, privilege, work product character or admissibility as evidence, for any purpose, of (a) the Interrogatories or any part thereof, (b) statements made in these Supplemental Responses to the Interrogatories or any part thereof or (c) any information disclosed and/or any documents identified as part of Defendants’ Supplemental Responses to the Interrogatories or any part thereof; (ii) their right to object to the use of any of the documents identified in response to these Interrogatories in any subsequent proceedings or the trial of this Action or any other action; or

(iii) their right to object on any grounds at any time to a demand for further response to these Interrogatories or other discovery requests in this Action. Any response, objection or agreement to provide information in response to an individual Interrogatory is not an acknowledgment or concession that the information sought exists or is in Defendants' possession, custody or control.

Defendants provide these First Supplemental Responses and Objections to the best of their present knowledge, information and belief. Defendants reserve the right to further supplement or amend these Supplemental Responses and Objections from time to time as appropriate in accordance with the Federal Rules.

GENERAL OBJECTIONS

1. Defendants hereby incorporate the General Objections sets forth in Defendants' Responses and Objections to Lead Plaintiff's First Set of Interrogatories, served May 27, 2022.

RESPONSE TO INTERROGATORIES

INTERROGATORY NO. 2:

Identify the persons upon whose "work, opinions, information, representations and advice" Defendants contend that they reasonably relied on for purposes of the Ninth Affirmative Defense in Defendants' Answer. *See* ECF 72 at 37.

RESPONSE TO INTERROGATORY NO. 2:

Defendants object to this Interrogatory on the grounds set forth in their General Objections, including on the grounds that it is a premature contention interrogatory that has been submitted several months before the discovery cutoff and prior to the substantial completion of discovery in this Action, including discovery into the Ninth Defense. Defendants further object to this Interrogatory to the extent it suggests that the Ninth Defense forms a separate affirmative defense as to which Defendants bear the burden of proof at trial. Good faith and reasonable reliance on others could negate one or more essential elements of Lead Plaintiff's claims, upon

which they have the burden of proof, including but not limited to scienter. *See Pipefitters Local No. 636 Defined Ben. Plan v. Zale Corp.*, 499 F. App'x 345, 350 (5th Cir. 2012); *Southland Securities Corp. v. INSpire Ins. Solutions, Inc.*, 365 F.3d 353, 373 (5th Cir. 2004).

Subject to and without waiving the foregoing General and Specific Objections, Defendants state that they will identify the persons upon whose work, opinions, information, representations and/or advice they reasonably relied upon the completion of fact discovery in this Action. *See Fed. R. Civ. P. 33(a)(2); Trident Mgmt. Grp., LLC v. GLF Constr. Corp.*, No. CV 16-17277, 2017 WL 3011144, at *3.

FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2:

Subject to and without waiving the foregoing objections, Defendants state that certain of the Defendants relied on the work, opinions, information, representations and/or advice of certain of the following persons in making certain of the statements alleged in the Amended Complaint (ECF No. 55) to be false or misleading:

Name	Affiliation During the Class Period
David M. Blakeley	Anadarko Petroleum Corporation
Forrest H. Burton	Anadarko Petroleum Corporation
Chris F. Camden	Anadarko Petroleum Corporation
Michael R. Cieslak	Anadarko Petroleum Corporation
John M. Colglazier	Anadarko Petroleum Corporation
Robin H. Fielder	Anadarko Petroleum Corporation
Lisa N. Gauthier	Anadarko Petroleum Corporation
Elizabeth N. Hillis Gibson	Anadarko Petroleum Corporation
Catherine A. Green	Anadarko Petroleum Corporation
Darrell E. Hollek	Anadarko Petroleum Corporation
David A. Janise	Anadarko Petroleum Corporation
Breck Robert Johnson	Anadarko Petroleum Corporation
Jim J. Kleckner	Anadarko Petroleum Corporation
Kevin W. Martindale	Anadarko Petroleum Corporation
Pat L. McGrievy	Anadarko Petroleum Corporation

Name	Affiliation During the Class Period
Ryan S. Morgan	Anadarko Petroleum Corporation
Matt Morris	Anadarko Petroleum Corporation
Christian Noll	Anadarko Petroleum Corporation
Jeff E. Pachman	Anadarko Petroleum Corporation
Wendy Lee Prosser	Anadarko Petroleum Corporation
Jake M. Ramsey	Anadarko Petroleum Corporation
Jennifer L. Roberts	Anadarko Petroleum Corporation
Diane D. Sease	Anadarko Petroleum Corporation
Doug R. Shotts	Anadarko Petroleum Corporation
Jeremy M. Smith	Anadarko Petroleum Corporation
Kevin K. Stacy	Anadarko Petroleum Corporation
Anita Steinberger-Glaser	Anadarko Petroleum Corporation
Robert W. Strickling	Anadarko Petroleum Corporation
William A. Tedesco	Anadarko Petroleum Corporation
Tim A. Trautman	Anadarko Petroleum Corporation
Kristi V. Valka	Anadarko Petroleum Corporation
Scott J. Wilkins	Anadarko Petroleum Corporation
Louis L. Williams	Anadarko Petroleum Corporation
Susan A. Young	Anadarko Petroleum Corporation
Cobalt International Energy	N/A
ConocoPhillips	N/A
Marathon Oil Corporation	N/A
Venari Resources LLC	N/A
KPMG LLP	N/A
Schlumberger Limited	N/A

Defendants are continuing to investigate the subject matter of this Interrogatory and reserve the right to amend or supplement their supplemental response to this Interrogatory

pursuant to Fed. R. Civ. P. 33(d), to the extent additional non-privileged, relevant information responsive to this interrogatory is located.

Dated: June 17, 2022

/s/ Daniel Slifkin

CRAVATH, SWAINE & MOORE LLP

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CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2022, I caused the foregoing document to be served via electronic mail on the following parties:

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